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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

NATIONAL TPS ALLIANCE, et al.,
Plaintiffs,

vs.

KRISTI NOEM, in her official capacity as
Secretary of Homeland Security, UNITED
STATES DEPARTMENT OF HOMELAND
SECURITY, and UNITED STATES OF
AMERICA,

Defendants.

Case No. 3:25-cv-05687-TLT

**DECLARATION OF JESSICA KARP
BANSAL IN SUPPORT OF PLAINTIFFS'
MOTION FOR CLASS CERTIFICATION**

[Filed concurrently with Motion, supporting
Attorney Declarations of Ahilan T.
Arulanantham, Emilou H. MacLean, and Erik
Crew; and [Proposed] Order]

Assigned to: Hon. Trina L Thompson

Date: September 16, 2025
Time: 2:00 p.m.
Place: Courtroom 9

Complaint Filed: July 7, 2025

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DECLARATION OF JESSICA KARP BANSAL

I, Jessica Karp Bansal, hereby declare:

1. I am an attorney at law licensed to practice in the State of California, and I am counsel with the National Day Laborer Organizing Network (“NDLON”). I am counsel of record for Plaintiffs in this action and I make this declaration in support of Plaintiff’s Motion for Class Certification. I have personal knowledge of the facts set forth herein, and if called upon to testify as a witness thereto, I could and would competently do so under oath.

2. I was admitted to practice law in California in 2011 and admitted to practice in New York in 2010, and am a member in good standing of both state bars. I graduated from Columbia Law School in 2009, after which, I served as a judicial clerk to the Honorable Stephen Reinhardt of the Ninth Circuit Court of Appeals. From 2010 to July 2019, I worked at the National Day Laborer Organizing Network, where I held the titles of Staff Attorney, Litigation Director, and Legal Director. From 2013 to 2015, I also worked as an adjunct law professor at the immigrant rights clinic at the University of California at Irvine School of Law. From 2019 to 2022, I worked as a senior staff attorney at the ACLU of Southern California. From 2022 to 2025, I worked as the Legal Director for Organized Power in Numbers. Since February 2025, I have returned to the National Day Laborer Organizing Network.

3. In addition to being admitted to practice in both California and New York, I am admitted to several federal courts, including the United States Court of Appeals for the Ninth Circuit, the Northern District of California, and the Central District of California.

4. NDLON is dedicated to advancing the rights of immigrant and low-wage workers in the United States, including through litigation and advocacy.

5. NDLON has substantial expertise in class action litigation and immigrants’ rights litigation, and has participated in numerous cases in federal court related to policies and practices of the federal immigration system.

6. I have spent my entire legal career working on immigrants’ rights cases and have thus obtained substantial experience litigating cases involving immigrants’ rights. I have represented immigrants in a number of cases addressing systemic issues in the federal immigration system

1 through class actions. For example, I was co-lead counsel in the following class actions challenging
2 federal immigration enforcement and detention policies: *Hernandez Roman v. Wolf*, No. 20-cv-
3 00768 (C.D. Cal. 2020) (class action challenge to constitutionality of immigration detention during
4 the COVID-19 pandemic); *Gonzalez v. ICE*, 416 F. Supp. 3d 995 (C.D. Cal. 2019) (finding that ICE
5 violated the Fourth Amendment by systemically issuing detainers to class members without probable
6 cause).

7 7. I was also counsel in a class action challenging the lack of appointed legal
8 representatives for immigrants with serious mental abilities, *see Franco-Gonzalez v. Holder*, Case
9 No. 2:10-02211-DMG-DTB (C.D. Cal. 2011); a class action raising constitutional and state law
10 challenges to the Los Angeles Sheriff's Department's practices with respect to detention of
11 individuals pursuant to requests from federal immigration officers, *see Roy v. Cty. of L.A.*, No. 12-
12 9012, (C.D. Cal. 2012); and a class action challenging an Arizona state law that sought to regulate
13 immigration and criminalize the solicitation of day labor. *See Sol v. Whiting*, No. CV-10-01061-
14 PHX-SRB, 2015 WL 12030514 (D. Ariz. Sept. 4, 2015).

15 8. In addition, I have represented immigrants in a number of non-class cases raising
16 complex legal issues. For example, I serve or have served as co-lead counsel in *National TPS*
17 *Alliance et al. v. Noem et al (NTPSA I)*, Case No. 25-cv-01766 (N.D. Cal. 2025) (challenging
18 termination of Temporary Protected Status for over one million immigrants from Haiti and
19 Venezuela); *Ramos v. Nielsen*, No. 18-cv-01554 (N.D. Cal. 2018) (challenging the termination of
20 Temporary Protected Status for over 400,000 immigrants from El Salvador, Haiti, Honduras, Nepal,
21 Nicaragua, and Sudan); and *Puente v. Arpaio*, No. CV-14-01356 (D. Ariz. 2014) (challenging
22 worksite raids in Maricopa County on constitutional grounds).

23 9. My colleague and proposed class counsel, Lauren Michel Wilfong, is an immigrants'
24 rights litigator at NDLOM. Mx. Wilfong graduated *cum laude* from New York University School of
25 Law in 2021. Following graduation, they completed a two-year Justice Catalyst legal fellowship at
26 Justice Action Center (JAC), a nonprofit organization that brings impact litigation to advance
27 immigrant rights. They joined NDLOM in 2023 as a Staff Attorney, where they continue to
28 specialize in immigrant rights. Mx. Wilfong is admitted to practice law in New York and New

Jersey, as well as several federal courts, including the United States Court of Appeals for the Ninth Circuit, the District of New Jersey, the Southern District of New York, the Western District of New York, and the District of the District of Columbia.

10. Mx. Wilfong has substantial experience litigating complex immigrants' rights cases in federal court, representing individuals and organizations with large memberships. For example, they serve as counsel in *National TPS Alliance et al. v. Noem et al (NTPSA I)*, No. 25-cv-01766 (N.D. Cal. 2025) (challenging termination of Temporary Protected Status for over one million immigrants from Haiti and Venezuela) and in *Vasquez Perdomo et al. v. Noem et al.*, No. 2:25-cv-05605-MEMF-SP (C.D. Cal. 2025) (putative class action with pending class certification motion, challenging suspicionless stops and warrantless arrests without identification, explanation, or individualized flight risk assessment).

11. They previously served as counsel in *Haitian Bridge Alliance v. DHS*, No. 21-3317 (EGS) (D.D.C. 2021) (putative class action challenging Title 42 process and DHS's Haitian Deterrence Policy); *Texas v. DHS*, No. 6:23-cv-00007 (S.D. Tex 2023) (representing intervenor-defendants defending against states' challenge of the Cuba, Haiti, Nicaragua, and Venezuela humanitarian parole processes); and *Immigrant Defenders Law Center et al. v. DHS*, No. 2:21-cv-00395-FMO-RAO (C.D. Cal. 2021) (challenging policy denying unaccompanied children subjected to the Migrant Protection Protocols program of their rights under the Trafficking Victims Protection Reauthorization Act). Mx. Wilfong also served as counsel in several Freedom of Information Act lawsuits, including *Haitian Bridge Alliance v. DHS*, No. 1:22-cv-08344-ER (S.D.N.Y. 2022) (seeking documents regarding the treatment of Haitian immigrants detained in Del Rio, Texas in 2021) and *Robert F. Kennedy Human Rights v. ICE*, No. 1:22-cv-00929-LJV-HKS (W.D.N.Y. 2022) (seeking documents regarding policies and conditions of confinement at immigration detention center).

12. NDLO has capacity to thoroughly and vigorously litigate the claims in this case and properly represent Plaintiffs and the proposed classes, alongside our proposed class co-counsel, and intends to commit all necessary resources to do so. If appointed class counsel, I will ensure that

1 NDLON, Mx. Wilfong, and I zealously represent the interests of the classes to the best of our
2 collective ability.

3 13. If appointed class counsel, I will ensure that the attorneys listed in this declaration
4 and I zealously represent the interests of the class to the best of our collective ability.

5 14. I am not aware of any conflict among potential class members in this case.

6 15. I am not aware of any conflicts between NDLON and any members of the potential
7 class that would prevent NDLON from providing zealous representation to the class.

8 I declare under penalty of perjury under the laws of the United States and the State of
9 California that the foregoing is true and correct to the best of my knowledge. Executed on August
10 15, 2025, in Claremont, California.

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12 /s/ Jessica Karp Bansal
13 Jessica Karp Bansal
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CERTIFICATE OF SERVICE

I hereby certify that on August 15, 2025, I caused the foregoing to be electronically filed with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to all counsel of record.

NATIONAL DAY LABORER
ORGANIZING NETWORK

/s/ Jessica Karp Bansal

Jessica Karp Bansal
Lauren Michel Wilfong (*Pro Hac Vice*)